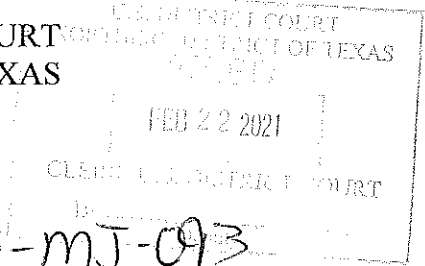


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



IN THE MATTER OF THE SEARCH OF

Oath Holdings Inc account:

angelaam85@yahoo.com

Case No.

4:21-mj-093

Filed Under Seal

MOTION FOR NONDISCLOSURE

The United States of America, by and through the United States Attorney for the Northern District of Texas, requests that the Court issue an order commanding the subject of the above search warrant not to notify any person of the existence of the warrant or any related court orders, and in support of its motion, would show the Court the following:

18 U.S.C. § 2705(b) provides that:

A governmental entity acting under section 2703, when it is not required to notify the subscriber or customer under section 2703(b)(1), or to the extent that it may delay such notice pursuant to subsection (a) of this section, may apply to a court for an order commanding a provider of electronic communications service or remote computing service to whom a warrant, subpoena, or court order is directed, for such period as the court deems appropriate, not to notify any other person of the existence of the warrant, subpoena, or court order. The court shall enter such an order if it determines

that there is reason to believe that notification of the existence of the warrant, subpoena, or court order will result in--

- (1) Endangering the life or physical safety of an individual;
- (2) Flight from prosecution
- (3) Destruction of or tampering with evidence;
- (4) Intimidation of potential witnesses; or
- (5) Otherwise seriously jeopardizing an investigation or unduly delaying a trial.

Here, notice to the subscribers or customers, or other individuals, would seriously jeopardize the ongoing investigation, because a disclosure would give the subscriber an opportunity to destroy evidence, change patterns of behavior, or flee from prosecution. Moreover, some of the evidence in this investigation is stored electronically. If alerted to the existence of the warrant, the subject under investigation could destroy that evidence, including information saved to his or her personal computers.

WHEREFORE the United States requests that the Court issue an order commanding the subjects of the above search warrant not to notify any person of the existence of the warrant or any related court orders for a period of one year from the date of the Court's Order.

Respectfully Submitted,

PRERAK SHAH
ACTING UNITED STATES ATTORNEY

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